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UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

RONALD M. JANUS,
 Plaintiff,

vs.

SILVERTON CASINO, LLC, a Nevada
 limited liability company,
 Defendant.

Case No.: 2:24-cv-01940-APG-MDC

**STIPULATION AND ORDER
 TO EXTEND DISCOVERY**

(First Request)

Plaintiff RONALD M. JANUS and SILVERTON CASINO, LLC, a Nevada limited liability company, by and through their respective counsels of record, hereby STIPULATE and AGREE to amend the Stipulated Discovery Plan and Scheduling Order, ECF No. 13, to extend the discovery period in this case for an additional ninety (90) days, from May 19, 2025, to **August 18, 2025**. This is the first extension of the discovery period that has been requested in this matter.

1. DISCOVERY COMPLETED TO DATE:

Plaintiff served his initial disclosures, as required under Fed. R. Civ. P. 26(a)(1)(A), on January 10, 2025.

1 Defendant served its initial disclosures, as required under Fed. R. Civ. P. 26(a)(1)(A), on
2 January 21, 2025.

3 On April 9, 2025, Plaintiff served “Plaintiff’s First Set of Requests for Production of
4 Documents” and “Plaintiff’s First Set of Interrogatories” on Defendant. Defendant’s responses are
5 due on May 12, 2025, and, as such, Defendant has not yet served its responses.

6 **2. DISCOVERY YET TO BE COMPLETED:**

7 Plaintiff intends to take depositions of the following persons identified in Plaintiff’s Initial
8 Disclosures:

- 9 a. Karen Bautista;
- 10 b. Steve Brown;
- 11 c. Michael Hicks;
- 12 d. Teresa Hilton;
- 13 e. Sheila Kircher;
- 14 f. Catherine Macari;
- 15 g. Shendi Moon; and
- 16 h. Clark Silva.

17 Plaintiff may serve additional discovery or notice additional depositions based on the results
18 of the discovery conducted.

19 Defendant intends to serve written discovery, including interrogatories, requests for
20 production of documents, and requests for admissions on Plaintiff. Defendant intends to take the
21 deposition of Plaintiff and other depositions as necessary. Defendant will subpoena third parties as
22 necessary.

23 **3. REASONS WHY REMAINING DISCOVERY HAS NOT YET BEEN COMPLETED:**

24 The parties participated in an Early Neutral Evaluation (“ENE”) session on March 21, 2025.
25 The parties had agreed to hold off on discovery until after the ENE, especially in light of the fact that
26 the additional discovery would include a large number of depositions. The parties had hoped that
27 the resources for conducting this additional discovery could be directed into resolving this matter.

28 In addition, counsel for Defendant has had to attend to important family matters over the past

several weeks.

4. REVISED DISCOVERY PLAN:

1. Discovery Cut-Off Date: August 18, 2025. In the original Stipulated Discovery Plan and Scheduling Order, this was set for May 19, 2025, which was 180 days from November 18, 2024, the date of the filing of Defendant Silverton Casino, LLC's Answer to Plaintiff's Complaint, ECF No. 10.

2. Amending the Pleadings and Adding Parties: In the original Stipulated Discovery Plan and Scheduling Order, the deadline for filing motions to amend the pleadings or to add parties was set for February 18, 2025, 90 days prior to the original close of discovery. This deadline has passed and, therefore, is not being extended in this stipulation.

3. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):

a. In the original Stipulated Discovery Plan and Scheduling Order, the deadline for disclosures concerning experts was set for March 20, 2025, 60 days prior to the original close of discovery. This deadline has passed and, therefore, is not being extended in this stipulation.

b. In the original Stipulated Discovery Plan and Scheduling Order, the deadline for disclosures concerning rebuttal experts was set for April 21, 2025, 30 days prior to the original close of discovery. This deadline has passed and, therefore, is not being extended in this stipulation.

4. Dispositive Motions: The date for filing dispositive motions shall be not later than **September 17, 2025**, 30 days after the new discovery cut-off date. In the event that the discovery period is extended from the discovery cut-off date set forth in this Stipulation and Order to Extend Discovery (First Request), the date for filing dispositive motions shall be extended for the same duration, to be not later than 30 days from the subsequent discovery cut-off date. In the original Stipulated Discovery Plan and Scheduling Order, the deadline for filing dispositive motions was set for June 18, 2025, 30 days after the original close of discovery.

5. Pretrial Order: The date for filing the joint pretrial order shall be not later than **October 17, 2025**, 30 days after the date set for filing dispositive motions. In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30 days after decision on the dispositive motions or until further order of the court. In the original

1 Stipulated Discovery Plan and Scheduling Order, the deadline for filing the joint pretrial order was
 2 set for July 18, 2025, 30 days after the prior deadline for filing dispositive motions. In the event that
 3 dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30
 4 days after decision on the dispositive motions or until further order of the court.

5 6. Fed. R. Civ. P. 26(a)(3) Disclosures: As set forth in the original Stipulated Discovery
 6 Plan and Scheduling Order, the disclosures required by Fed. R. Civ. P. 26(a)(3), and any objections
 7 thereto, shall be included in the pretrial order.

8 7. Additional Extensions of the Discovery Period: The last day for the parties to file
 9 their Motion and/or Stipulation to Extend Discovery shall be **July 28, 2025**, twenty (21) days prior
 10 to the revised discovery cut-off.

11 Therefore:

Deadline	Current Deadline	New Deadline
Discovery Cut-Off	May 19, 2025	August 18, 2025
Last Day to Extend Discovery	April 28, 2025	July 28, 2025
Dispositive Motions	June 18, 2025	September 17, 2025
Pre-Trial Order	July 18, 2025	October 17, 2025

15 No trial date has yet been ordered.

16 DATED: May 1, 2025.

DATED: May 1, 2025.

17 LAW OFFICES OF ROBERT P. SPRETNAK

KAMER ZUCKER ABBOTT

18 By: /s/ Robert P. Spretnak
 19 Robert P. Spretnak, Esq. (Bar No. 5135)

By: /s/ R. Todd Creer
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21 Attorney for Ronald M. Janus, Plaintiff

Attorneys for Silverton Casino, LLC, Defendant

22 IT IS SO ORDERED.

23
 24
 25
 26
 27 Hon. Maximilian D. Couvillier III
 United States Magistrate Judge
 DATED: 5/2/2025